

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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JUL - 7 1992

In the Matter of)

Billed Party Preference)
for 0+ InterLATA Calls)

CC Docket No. 92-77

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

ORIGINAL
FILE

COMMENTS OF INTERNATIONAL TELECHARGE, INC.

Respectfully submitted,

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COMMENTS OF INTERNATIONAL TELECHARGE, INC.

International Telecharge, Inc. ("ITI") hereby submits its comments in response to the Commission's Notice of Proposed Rulemaking in the above-captioned proceeding.¹

SUMMARY

As explained further below, ITI opposes the adoption of a system of billed party preference for 0+ interLATA calling. Although, on its face, billed party preference appears to offer consumers an ideal form of 0+ equal access, in fact, it has a number of significant drawbacks that clearly outweigh its purported benefits. Two rounds of comments on billed party preference have created more unanswered questions about the costs of billed party preference and the technical parameters of its implementation than they have resolved. Before requiring local exchange carriers ("LECs") and operator service providers ("OSPs") to invest potentially millions of dollars to create a system of billed party preference -- which ultimately must be recouped from end users in the form of higher rates -- the Commission must carefully measure the advantages and disadvantages of billed party preference against

1 Notice of Proposed Rulemaking, Billed Party Preference
for 0+ InterLATA Calls, CC Docket No. 92-77, FCC 92-169 (rel. May
8, 1992) ("Notice" or "NPRM").

its stated objective to create a less confusing, "user friendly" operator services marketplace. The inevitable conclusion of such a review is that the existing system of premises owner presubscription and access code dialing meets the Commission's goals without imposing another technical upheaval on consumers.

I. BILLED PARTY PREFERENCE WILL NOT SERVE THE COMMISSION'S OBJECTIVE OF CREATING A "USER FRIENDLY" OPERATOR SERVICES MARKETPLACE

In the Notice, the Commission notes that the advent of competition in operator services has changed the way in which the public makes an operator services call.² As a result, the Commission found that consumers have been confused by the choices available to them.³

In order to meet these consumer concerns, over the last few years, the FCC and Congress have enacted a series of regulations designed to ensure that customers are able to reach their carriers of choice. For example, all carriers must double-brand on operator services calls⁴ and ensure that their name, address and toll free number are posted on or near all telephones presubscribed to them.⁵ In addition, carriers and aggregators must ensure that access to other carriers through 1-800 and 950 numbers is not blocked.⁶ Further, the Commission recently adopted a decision setting a

² Notice, para. 14.

³ Id.

⁴ 47 C.F.R. 64.703(a).

⁵ Id.

⁶ Id. 64.704.

revised schedule for unblocking of 10XXX access as well.⁷ As the Commission stated in the Notice,

These measures will ensure that any caller is able to reach his/her carrier of choice. In order to do so, however, callers must be willing and able to dial a carrier access code, when necessary. Callers will be able to dial on a 0+ basis only if they are willing to route their call to the OSP presubscribed to the originating line and only if that OSP can accept the billing⁸ mechanism (e.g. calling card) used by the caller.⁸

Despite the growing success of the Commission's efforts in ensuring customer choice in the presubscription environment, in the Notice, the Commission stated its belief that "[b]illed party preference could make operator services more 'user friendly.'"⁹ The Commission noted that under billed party preference, callers would not have to concern themselves with whether their preferred carrier is presubscribed to the telephone or whether they must use an access code; "they could dial on a 0+ basis wherever billed party preference was available, and they would automatically reach the billed party's carrier. Billed party preference would thus be simpler for callers."¹⁰

ITI appreciates the Commission's concern that the transition from a monopoly to a competitive operator services marketplace has, at times, created confusion and frustration for certain customers.

⁷ News Release, CC Docket No. 91-35, Order on Reconsideration, FCC 92-275 (June 25, 1992).

⁸ Notice, para. 15.

⁹ Id., para. 16

¹⁰ Id., para. 18.

The transition to a competitive 1+ marketplace, which subscribers now take for granted, was also a source of confusion to a great many customers.

Despite the facial appeal of billed party preference, however, it has a number of drawbacks which raise serious doubts as to whether it will serve the Commission's goal of providing consumers with a more "user friendly" environment. Until these matters are fully understood and resolved, the Commission should not mandate adoption of a system of billed party preference.

First, in order to ease the consumer's burden in placing an operator services call, billed party preference must be universally available throughout the country in a uniform format. Much more confusing than today's system of premises owner presubscription and access code dialing would be an environment in which the billed party's choice of carrier is automatically assured by 0+ at some locations but not at others. By its nature, 0+ dialing serves primarily the traveling public. Therefore, unlike the gradual transition to equal access in the 1+ environment, where individuals served by unconverted end offices were required to change their dialing patterns once, travelers would have to be sufficiently sophisticated to know whether billed party preference was available in any given dialing area and be prepared to adapt their dialing patterns accordingly.

It is ITI's understanding that billed party preference will not be available in a number of settings. For example, billed party preference will not be available in locations served by non-

equal access end offices.¹¹ Moreover, it is unclear whether aggregator locations served by special access arrangements or competitive access providers, which bypass the LEC central office, are capable of offering billed party preference. Similarly, store and forward devices also would not work in a billed party preference environment. Another apparent drawback of billed party preference is that it only will be available on a nationwide basis to those OSPs which have a point of presence ("POP") in every LATA, thus limiting its usefulness to all but the largest three or four carriers. Further, as discussed below, unless the LEC and OSP both have implemented SS7 signalling technology, billed party preference can only be implemented in a cumbersome manner with a significant degradation of service quality.

Each of these factors contributes to a lack of uniformity in the ability of LECs throughout the country to offer billed party preference, thus increasing the likelihood of customer frustration and confusion for several years after implementation. Until nationwide uniformity in the offering of billed party preference is available, it is unlikely that the system will serve the Commission's goal of creating a "user friendly" operator services marketplace.

Second, although accurate, reliable figures are not yet available, by all accounts, the development and implementation of billed party preference will be extremely expensive. As the

¹¹ See, e.g., Reply Comments of U S West Communications Inc., RM-6723 (Dec. 23, 1991).

Commission remarked in the Notice, LEC cost estimates range from \$50 million for Southwestern Bell Telephone Company to \$200 million for Pacific Bell.¹² These costs will be recovered by the LECs from those OSPs subscribing to billed party preference. The OSPs, in turn, will recover the costs from end users in the form of higher rates. AT&T estimates that the costs of subscribing to billed party preference for its traffic would be \$560 million.¹³ Higher operator services rates, when reasonable alternatives exist, are not likely to be viewed as "user friendly" by consumers.

The high cost of billed party preference must be weighed against the benefits that it will bring to the marketplace over presubscription. As the Commission has recognized, the vast majority of aggregator locations have been presubscribed to AT&T and, based on 1+ market share figures, most callers subscribe to AT&T.¹⁴ Where phones are presubscribed to AT&T with callers seeking AT&T -- the likely scenario in over 50 percent of the calls -- the billed party preference option would be of no benefit to over presubscription. Only in the remaining minority of cases would the carrier selection feature of billed party preference ever come into play.

It is also possible, however, that the high costs of billed

¹² Notice, para. 25.

¹³ Supplemental Comments of American Telephone and Telegraph Company at 3, RM-6723, (Nov. 22, 1991).

¹⁴ Notice, note 9. In fact, AT&T's share of the 0+ market is much greater than that reflected in presubscribed lines due to its power in the calling card market.

party preference will lead to greater competition in the access code calling card marketplace, much as it has today. It is easily foreseeable that, if billed party preference significantly raises the costs of providing 0+ service as expected, carriers will focus their efforts on competing for customers by touting the lower rates that would be available from dialing the OSP directly through an access code. Moreover, it appears likely that carriers will be able to continue to offer more services, such as voice card services, on their calling cards by maintaining access code dialing. Continued use of access code dialing would bypass the costs and delays associated with billed party preference thus leaving the LECs with stranded investment in a service which is too expensive and cumbersome for consumers. In short, consumers will be even more confused and an enormous amount of money will have been wasted.

Finally, the comments previously submitted on billed party preference also indicate that it is likely to lead to a serious degradation in the quality of operator services. Call set-up times are likely to increase significantly, particularly where the LEC or the OSP has not deployed SS7 signalling capability. Moreover, it appears that two operators would be necessary for certain types of calls, unless the LECs deploy Automated Alternate Billing Services ("AABS"). Clearly, the public would not be better served by an operator services system that increases the time necessary to place a call and requires the consumer to repeat billing information to two operators. As with the costs of implementing

billed party preference, the parties best able to explain the functioning of the network are the LECs. However, prior to adoption of any rules concerning billed party preference, the Commission should ensure that it has received full, complete and consistent answers to the problems of service quality.

The Commission's goal of establishing a "user friendly" operator services marketplace is laudable. However, based on the existing record, it appears that billed party preference is fraught with problems and uncertainties and unlikely to serve that objective. It does not appear that the LECs are now capable of implementing a uniform, cost-effective, high quality billed party preference service offering. To the contrary, the record thusfar produced raises more questions and concerns than it answers. Accordingly, ITI urges the Commission to continue its existing presubscription regulation of the operator services marketplace.

II. BILLED PARTY PREFERENCE WILL HAVE AN ADVERSE IMPACT ON OPERATOR SERVICES COMPETITION

In the Notice, the Commission tentatively found that a public interest benefit of billed party preference is that it would focus competition in operator services towards end users rather than aggregators.¹⁵ The Commission also found that billed party preference might "increase parity in the [presubscription] operator services marketplace" where AT&T enjoys an advantage because it has the greatest number of customers and can offer higher overall

¹⁵ Notice, para. 19.

commissions.¹⁶

Contrary to the Commission's findings, billed party preference will have a severe adverse impact on competition in the operator services marketplace. As noted earlier, in order to participate in billed party preference on a nationwide basis, an OSP must have a POP in every LATA. Thus, only the largest three or four carriers are likely to be able to market the availability of the service over their networks. Under the Commission's proposal, all remaining carriers, most of which are small, regional carriers, would have to designate one of the larger carriers as its "partner" for calling outside of the OSP's region or continue to rely on access code dialing.¹⁷

It has been ITI's experience in the past (particularly, in the context of coin-sent paid traffic), that the larger carriers are not amenable to "partnership" arrangements with smaller carriers. After all, why should one of the larger national IXCs settle for half the traffic from a smaller carrier's customer when it probably can gain all the traffic by refusing to engage in a partnership arrangement? Even if the larger carriers are compelled by the Commission to enter into sharing arrangements with smaller carriers, the necessity of sharing the customer base with a competitor will create marketing difficulties and competitive concerns. Without the ability to offer customers uniform, nationwide access through billed party preference, smaller regional

¹⁶ Id.

¹⁷ Notice, para. 35.

carriers are simply not going to be able to compete in the billed party preference environment. The result will be the return of the operator services marketplace to a small oligopoly of the largest 1+ carriers, with market shares likely to mirror the existing 1+ marketplace, as customers choose the carrier most familiar to them as their 0+ carrier.

In contrast, the existing system of presubscription and access code dialing has spawned intense competition both for aggregators and for end users. As the Commission noted, the system of premises owner presubscription focuses one level of competition largely on the aggregator, with the winner often being the carrier able to pay the highest commissions. However, the ability of premises owners to collect commissions has long been recognized as having a positive impact on the availability of public telephones. Under billed party preference, the loss of commissions will, presumably, result in fewer public telephones and a greater burden on the compensation mechanism for private payphones. Moreover, it appears that billed party preference could render one innovative payphone product -- the store and forward payphone -- entirely obsolete.

In addition to aggregator competition, the Commission's recent orders guaranteeing access to the customer's carrier of choice have also created an intensely competitive submarket of access code competition among carriers that issue calling cards. As The New York Times recently reported, "[t]he big long-distance carriers are flooding the country with advertisements for telephone calling

cards."¹⁸ Any traveler walking through a major airport today is faced with a barrage of advertisements by AT&T advising its customers to dial 10288. Moreover, according to statements by an AT&T spokesperson, AT&T customers have grown accustomed to dialing access codes.¹⁹ Sprint and MCI also compete for customers by advertising calling cards which utilize access codes. This competition is firmly focussed on the end user.

This calling card competition has also created innovative, new services many of which may be available only through access code dialing. The New York Times reported:

But as the recession has slowed growth in the long-distance market, long-distance carriers have found that calling cards are valuable marketing tools. Hence the recent proliferation of services for card holders, ranging from the electronic delivery of messages to up-to-date stock quotations and weather forecasts, as well as, with AT&T, interpreters who can deal with 140 languages.²⁰

Other examples of calling card based services include enhanced fax mailboxes, and voice activation cards. In addition, commercial credit card companies, such as VISA and MasterCard compete for long distance billings.

Calling card competition aimed at end users has grown in the

¹⁸ A. Ramirez, "Plastic Keys to Phone Wizardry", The New York Times (May 30, 1992) (attached).

¹⁹ See "AT&T Introduces '700' PCS-Type Numbers", FCC Report at 3,4 (May 4, 1992) ("the longer dialing sequence won't deter callers....'Customers have become used to [dialing 10288] to reach AT&T' said company spokeswoman Ellen Zundl.").

²⁰ A. Ramirez, "Plastic Keys to Phone Wizardry", The New York Times (May 30, 1992).

presubscription/access code regulatory environment.²¹ It is possible that the implementation of billed party preference will hamper this innovation and competition by needlessly inserting the LEC between the customer and the IXC. It is unclear whether the calling card services developed by IXCs for use on IXC networks will even work under billed party preference. It appears that commercial credit card services will not longer be usable for operator assisted dialing.²² Hence, prior to mandating billed party preference, the Commission should carefully examine the negative impact which billed party preference is likely to have on service innovation in the calling card market.

In addition to hampering innovation, the insertion of the LEC between the IXC and its customer under billed party preference has other competitive consequences. It is likely to further entrench the validation and billing and collection monopolies of the LECs. Moreover, it needlessly involves the LECs in interLATA communications at a time when they are seeking relief from the interLATA restrictions of the MFJ.

On the whole, therefore, billed party preference is likely to

²¹ As the Commission is aware from earlier comments filed in this proceeding on AT&T's CIID card, calling card competition has been intense, but it has not always been fair. The record in CC Docket No. 91-115 and this proceeding demonstrate that AT&T has abused its market power by issuing over 30 million calling cards in the CIID card format through a false and deceptive marketing campaign. In its comments in those matters, ITI expressed the view that all 0+ calling should be in the public domain and proprietary cards permitted only for access code calling.

²² Reply Comments of Mastercard International Incorporated and VISA filed in the Ameritech Proceeding, RM-6113 (Oct. 27, 1987).

have a serious adverse impact on competition in operator services. Because of its technical limitations, it will only be available on a nationwide basis to the largest carriers, thus eliminating competition from smaller, regional carriers. Moreover, it will eliminate some of the innovations of the last several years in the payphone and calling card markets and strengthen the monopoly power of the LECs over essential elements of an interLATA service. Accordingly, ITI urges the Commission to preserve the robust competition in operator services by rejecting billed party preference.

III. THE EXISTING SYSTEM OF PRESUBSCRIPTION AND ACCESS CODE DIALING MANDATED BY CONGRESS IS SERVING THE PUBLIC INTEREST

As the Commission stated in the Notice, the transition from monopoly to competition in operator services has caused confusion among customers. Moreover, the rapid proliferation of new carriers, equipment and services engendered by this competition has added to the confusion, as customer education has lagged behind innovation.

In response to concerns that the operator services marketplace was not adequately protecting the interests of consumers, the Congress enacted the Telephone Operator Consumer Services Improvement Act ("TOCSIA")²³ and the FCC has, within the last year, adopted rules implementing TOCSIA.²⁴ These provisions guarantee that customers know the identity of the presubscribed carrier, can

²³ 47 U.S.C. 226.

²⁴ E.g., Policies and Rules Concerning Operator Service Providers, 6 FCC Rcd 2744 (1991).

obtain its rates on request, or can reach the carrier of their choice from aggregator locations. TOCSIA also allows customers the option of dialing an access code or simply utilizing the convenience of 0+ dialing by using the carrier presubscribed to the telephone. As noted, in most cases, AT&T will be both the preferred and the presubscribed carrier.

The existing presubscription/access code system has also engendered highly competitive markets aimed at both aggregator locations and end user traffic. This competition has sparked innovation in aggregator equipment (e.g. store and forward technologies), calling card and other operator services and has lead to the increased availability of public telephones by ensuring premises owners a revenue stream in the form of commissions.

The presubscription/access code system mandated by Congress has thus served the public interest and will continue to do so. As carriers continue to educate the public as to the potential services available on their networks and the means to reach them over the next few years, confusion will only lessen as customers become more accustomed to the existing system. The introduction of billed party preference in two or three years will thus introduce new, unnecessary turmoil into the marketplace as callers once again adjust their calling patterns. Such upheaval is unnecessary and contrary to the public interest. Thus, the Commission's efforts would be better aimed at enforcing TOCSIA rather than revamping the operator services marketplace. Accordingly, ITI respectfully requests the Commission to continue

to promote the existing system of presubscription in order to ensure a convenient and competitive operator services system.

Respectfully submitted,

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July 7, 1992

ATTACHMENT

Plastic Keys to Phone Wizardry

By ANTHONY RAMIREZ

The big long-distance carriers are flooding the country with advertisements for telephone calling cards.

For customers of A.T.&T., MCI and Sprint, these wallet-size pieces of plastic can open a new and bewildering array of telecommunications wizardry. What should a consumer look for in a calling card, and which card offers the most services?

All three do what such cards were originally designed to do: let the customer make long-distance calls, usually from a pay phone, and charge them to a home or business account so that the caller does not have to carry around a fistful of coins. For calls made in foreign countries all three cards now offer access to an English-speaking operator, a boon for English-only speakers who are traveling in countries with bewildering telephone service and where American coins do not work in public phones.

Most calling-card users are business or vacation travelers, along with some college students, military personnel overseas and others without a personal or business phone. American Telephone and Telegraph has issued about 41 million cards, and MCI Communications and the Sprint Corporation about 20 million each.

Calling Cards in the 50's

Calling cards were invented in the 1950's but did not begin to become popular until 1982, when A.T.&T. automated the calling and billing processes, eliminating operators. Customers dial an access code to their carrier, then the number they want to call and their calling-card number. A computer confirms that the calling-card number is valid and then completes the call, billing the customer's phone at the end of the call.

But as the recession has slowed growth in the long-distance market, long-distance carriers have found that calling cards are valuable marketing tools. Hence the recent proliferation of services for card holders, ranging from the electronic delivery of messages to up-to-date stock quotations and weather forecasts, as well as, with A.T.&T., interpreters who can deal with 140 languages.

Which card to choose? The best thing for consumers for now is to sign up for all three major cards; they are all free, even for those who do not subscribe to the company's long-distance service. Calling cards can be ordered by phone: for A.T.&T., (800) 225-5288; for MCI, (800) 999-4400; and for Sprint, (800) 795-5978.

Signing up for all three cannot hurt and will probably save money. Carriers are desperate for customers and are often willing to give additional discounts or other forms of free telephone service to those who simply sign up and ask for them.

Take each card for a test drive. Many customers rarely, if ever, use the additional services. And when they do, they often find the services difficult to use in a hurry.

Services to Come

The most promising services are not widely available or are still being developed. A.T.&T., for example, is developing an "enhanced fax mailbox" in which companies can send facsimiles of documents to be stored for later retrieval — a cousin to a voice mailbox. Travelers can check their fax mailboxes and have the faxes sent to convenient locations, like a hotel front desk.

Most attractive of all is voice-activation, which is still being developed by the three carriers, with Sprint the furthest along. With this feature, customers do not have to dial long strings of numbers but can simply state an identification number.

An added benefit is that telephone scam artists, at least for now, cannot use the spoken identification number. The computer recognizes the unique pattern of the customer's voice rather than the number itself. A voice-activation card would be as difficult

to counterfeit as a fingerprint.

Many customers find that they use only a few features of a calling card regularly, like speed dialing, which employs two- or three-digit codes to zip through frequently called numbers, or teleconferencing, where a human operator links together three or more callers. But many of the most attractive services were introduced earlier this year and, as such, are as unfamiliar to the carriers' employees as to their customers.

It is important to find out which services are easy to use and how much human help the long-distance carrier is willing to give. Although several services incorporate clever technology, they will be useless if a long-distance carrier's operator cannot explain them to customers who, say, are in a hurry to catch a plane.

All three carriers offer an electronic message-delivery service for a fee

late, but none of his carrier's operators knew how to use the service.

"It could have happened with any company, but it just shows that customer support is very, very important," Mr. Briere said.

Moreover, while most carriers have "voice prompts" that slowly guide a caller through a range of choices, for anyone who hates "voice-mail jail" this delay is an electronic purgatory. Without a visual display, a caller can easily get lost with even the best-designed systems.

MCI's version of electronic delivery, for example, is easy to use, but it is not completely clear when the process is complete and it is all right to hang up. Its information service for stock quotations and other news is fairly easy to use, but its price, 49 cents a minute, makes The Wall Street Journal a better buy.

A Voice-Activation Card

Perhaps the most promising service is a voice-activation card that Sprint is testing. It is difficult to use at first. There are seven precise steps to acquaint the computer with the user's voice, and it may not work when the user has a cold or is calling on a static-filled cellular phone.

Nonetheless, it has fascinating possibilities. When Sprint has your home and office numbers, its computers can build a file of numbers frequently called from those phones. If the caller says "call home" or "call office," the computer will dial the number. In the future, one could presumably say, "I'm hungry," and the computer would call a takeout restaurant.

What is more likely is that in the future, five years or more away, calling cards will fade away altogether. A calling card is simply a method of mimicking or duplicating the services of a home or office phone, but if people start carrying their phones with them all the time, calling cards will become irrelevant.

All of the major telephone companies, including cellular carriers like McCaw Cellular Communications, are working on something called personal communications networks, where a cellular phone and a permanent telephone number allow calls to follow a customer anywhere.

Cards that provide stock quotations, the weather, even long-distance calls.

(\$1.60 per message, for example, at MCI). While answering machines are in many homes and businesses, they are not everywhere and they do not work when someone is on the phone. When a customer finds that the number he is calling is busy, he can dial a service that delivers a message in his own voice when the other person hangs up. Also, he can time the message to arrive at a certain hour, an advantage when a traveler is in Tokyo with a 13-hour time difference.

But Daniel D. Briere, president of Telechoice Inc., in Montclair, N.J., a consultant to telecommunications companies and their business customers, was frustrated recently while rushing to make a train in Grand Central Terminal in New York. He wanted to use a message-delivery service to tell a friend he would be

Calling cards from the big long-distance phone companies, including one from MCI that offers discounts to special groups of card holders.



Naum Kazhdan/The New York Times

As We Play

By LE

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CERTIFICATE OF SERVICE

I, Bonnita L. Bradley, a legal secretary at the law offices of Wiley, Rein & Fielding, hereby certify that on this 7th day of July, 1992, copies of the foregoing "Comments of International Telecharge, Inc. were caused to be sent by U.S. first class mail, postage prepaid, to each of the following parties:

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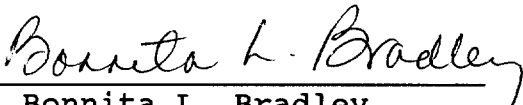
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